IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

CAROL HALE,	§	i i
Plaintiff,	§ §	
VS.	§ §	CIVIL ACTION NO. SA-08-CA-106-XR
JANET NAPOLITANO, SECRETARY,	§ §	
DEPARTMENT OF HOMELAND SECURITY,	§ §	
Defendant.	§ §	

DECLARATION OF GLEN MANGUM

"My name is Glen Mangum. I am at least 21 years of age, of sound mind, and capable of making this declaration.

I attended the University of Texas at Austin from 1970 to 1974, earning a Bachelor's Degree in Sociology. From 1976 to 1979, I attended St. Mary's University School of Law in San Antonio, Texas, and received a Doctor of Jurisprudence Degree upon graduation in May of 1979.

From February of 1980 to February of 1982, I was employed as a law clerk to the Honorable Robert B. O'Connor, United States Magistrate Judge for the Western District of Texas, San Antonio Division.

In February of 1982, I began the private practice of law as an associate of the Law Offices of Luis M. Segura, Inc. in San Antonio. As an associate of Mr. Segura, I acquired experience in practically all areas of labor and employment law.

In June of 1984, I resigned my employment with the Law Offices of Luis M. Segura and accepted employment with the law firm of Douglas & Elms in San Antonio. I was employed by Douglas & Elms from June of 1984 to October of 1986, during which time I continued to acquire

experience and develop expertise in all areas of labor and employment law. In October of 1986, I formed a professional corporation with another former associate of Douglas & Elms, and began doing business as Mangum & White, Inc. Mr. White moved to Midland in late 1987, and the corporation was dissolved.

Since late 1987, I have been a sole practitioner doing business as the Law Offices of Glen D. Mangum. My primary area of practice has been labor and employment law, and I have represented employees in both federal and state courts, and before federal (EEOC, MSPB) state, county and local administrative bodies.

I am licensed to practice law in all courts of the State of Texas, the United States District Courts for the Western, Southern and Northern Districts of Texas, the United States Courts of Appeals for the Fifth and Federal Circuits, and the United States Supreme Court. I am a member of the State Bar of Texas' Labor and Employment Law Section, and am also a member of the National Employment Lawyers Association, the Texas Employment Lawyers Association, and the San Antonio Chapter of the National Employment Lawyers Association, where I serve as President.

I have spoken at numerous conferences and seminars on employment law issues.

I am familiar with the customary fee for work done in Title VII cases in the San Antonio community. I have shared office space with Gaul and Dumont for more than ten years and am familiar with the experience, reputation, and ability of Malinda Gaul. An hourly billing rate of \$200.00 is well below the customary fee in the San Antonio community for someone with the experience, reputation, and ability of Ms. Gaul. A more reasonable and customary rate for Ms. Gaul's work would be \$350.00 per hour for pre-trial work and \$400.00 per hour for trial work.

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Pursuant to 28 U.S.C. Section 1746, I declare, certify, verify and state under penalty of perjury that the foregoing is true and correct."

Executed on the 29714 day of SEPTEMBER, 2009.

LEX MANGUM